

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

**RAS Citron, LLC**

130 Clinton Road, Lobby B, Suite 202

Fairfield, NJ 07004

Telephone: 973-575-0707

Facsimile: 973-404-8886

Authorized Agent for Secured Creditor Ditech Financial  
LLC

Aleisha C. Jennings (049302015)

In Re:

**John P. Conklin,**

**Debtor,**

**Melissa A. Conklin,**

**Joint Debtor.**

Case No.: 17-36011-KCF

Chapter: 13

Hearing Date: June 12, 2019

Chief Judge: Kathryn C. Ferguson

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY and CO-DEBTOR  
RELIEF FROM STAY**

HEARING DATE AND TIME:

June 12, 2019 at 9:00 A.M

**ORAL ARGUMENT IS REQUESTED IN THE EVENT  
OPPOSITION IS TIMELY FILED**

TO:

<b><i>Debtor-</i></b> John P. Conklin 63 Guilford Place Burlington, NJ 08016  <b><i>Joint Debtor-</i></b> Melissa A. Conklin 63 Guilford Place Burlington, NJ 08016	<b><i>Debtors' Attorney-</i></b> Brad J. Sadek Sadek and Cooper 1315 Walnut Street Ste 502 Philadelphia, PA 19107	<b><i>Trustee-</i></b> Albert Russo CN 4853 Trenton, NJ 08650-4853	<b><i>U. S. Trustee-</i></b> US Dept of Justice Office of the US Trustee  One Newark Center Ste 2100 Newark, NJ 07102
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PLEASE TAKE NOTICE that on June 12, 2019, at 9:00 a.m., or as soon thereafter as counsel may be heard, RAS Citron, LLC, attorneys for Ditech Financial LLC, the within creditor ("Creditor"), shall move before the Honorable Kathryn C. Ferguson, United States Bankruptcy Judge, at 402 East State Street, Trenton, N.J. 08608, Courtroom #2, for an Order pursuant to under Bankruptcy Code section 362(d) for relief from the automatic stay as to certain property and Co-Debtor Stay pursuant to 11 U.S.C. §1301 or, for costs and disbursements of this action, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Certification in Support of Motion for Relief. A proposed form of Order is also being submitted. A Memorandum of Law has not been submitted because the issues raised by the Motion are not extraordinary or unusual necessitating the filing of legal briefs.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) specify with particularity the basis of the objection; and (iii) be filed with the **CLERK, UNITED STATES BANKRUPTCY COURT, Clarkson S. Fisher US Courthouse, 402 East State Street, Trenton, NJ 08608**, and simultaneously served on Secured Creditor's counsel, **RAS Citron, LLC, 130 Clinton Road, Lobby B, Suite 202, Fairfield, NJ 07004**, so as to be received no later than seven (7) days before the return date set forth herein.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that counsel hereby requests oral argument in accordance with D.N.J. LBR 9013-1 (f) in the event opposition papers are timely filed.

DATED: May 3, 2019

**RAS Citron, LLC**

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Fairfield, NJ 07004

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By: /s/ Aleisha C. Jennings

Aleisha C. Jennings, Esquire

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